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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

[JAN 27 1993]

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Administration of the North)
American Numbering Plan)

CC Docket No. 92-237
Phase II

DOCKET FILE COPY ORIGINAL

REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its reply to the comments filed December 28, 1992 regarding Phase II of the above-referenced proceeding.

In its comments, USTA described the impact of Feature Group D (FGD) carrier identification code (CIC) expansion on exchange carrier network provision of equal access. Expansion will affect switching systems, database systems, operator services systems, signaling systems, billing systems and operational support systems. While it would be difficult to quantify the implementation costs of CIC expansion on an industry-wide basis, USTA noted that, based on the description of possible changes and the number of switches involved, the switching related costs for the industry would be in the billions of dollars. USTA also pointed out that FGD CIC expansion has been the subject of considerable debate throughout the industry and that no feasible technical alternative was identified. USTA stated that flash cut implementation was not feasible and that an exchange carrier

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should be permitted to make an individual assessment of whether the market requires the implementation of four digit FGD code capability. If the market is found to exist, an exchange carrier should be permitted sufficient time to make the changes required to implement such capability.¹ Finally, because many exchange carriers have already started to take steps to implement FGD CIC expansion, USTA stated that the Commission must notify the industry as soon as possible if it plans to modify how the industry is to proceed.

Exchange carrier filings in this docket confirm the substantial amount of time, resources, and expenses which exchange carriers have already utilized to begin implementing FGD CIC expansion.² Since the exchange carrier industry has committed to CIC expansion, absent Commission intervention, exchange carriers can be expected to proceed to voluntarily implement it, based on demand, within a reasonable timeframe.

As USTA noted in its comments, dialing parity is an issue which must be addressed. Dialing parity will be necessary for all carriers in a given area at a given time. However, there must be a limit on the length of time during which permissive

¹USTA at pp. 10-13.

²Ameritech at pp. 1-2, Bell Atlantic at p. 4, BellSouth at pp. 20-21, NYNEX at p. 3, Pacific Companies at p. 9, Southwestern Bell at p. 11 and Sprint at pp. 11-12.

dialing should be available.

In addition, due to the significant costs involved, the Commission should provide a mechanism to ensure full cost recovery.³

However, if the Commission decides to reassess the merits of FGD CIC expansion, a decision to cancel or postpone expansion must be made immediately in order to stop ongoing exchange carrier activities and to prevent further efforts aimed toward implementation. The Commission should then consider whether existing guidelines regarding the allocation of the remaining CICs are sufficient and whether new guidelines should be developed to handle the assignment, recall and transfer of the three digit codes. Such decisions will determine how quickly numbering resources are utilized.

The record in this proceeding establishes that CIC expansion is necessary and appropriate. However, CIC expansion should not be mandated or required on a flash-cut basis. Because of the costs involved, exchange carriers should be afforded sufficient

³Bell Atlantic at p. 4, Pacific Companies at p. 9.

time to implement it as the demand arises.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By

A handwritten signature in cursive script, appearing to read "Linda Kent", is written over a horizontal line.

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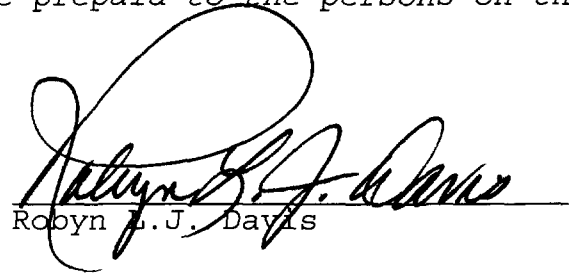
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January 27, 1993

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I, Robyn L.J. Davis, do certify that on January 27, 1993
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